

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS

V.

CA NO. 04-1350 (GMS)

DR. SYLVIA FOSTER, ETAL



MOTION FOR LEAVE TO PROPOUND
DISCOVERY FROM AND FOR DEFENDANTS
MOFFETT - GRAY - SAGERS AND JOHNSON
PURSUANT TO FED R. CIV P # 34 # 1(A)

DATE : 2/28/07

Jimmie Lewis
SBI # 506622
DEL. CORR. CENTER
1181 PADDOCK RD
SMYRNA, DEL 19977

1.) THE WORK SCHEDULE DATING FROM 5/21/04 TO 6/25/04 DURING THE COURSE OF THE PLAINTIFF'S STAY AT THE D.P.C FOR THE FOLLOWING D.P.C STAFF MEMBERS WHO THE DEFENDANTS MOFFETT - GRAY - SAGERS AND JOHNSON HAVE ASSERTED WILL BE WITNESS THEY CALL FOR AND OR INTEND TO UTILIZE DURING PRE TRIAL AND OR TRIAL PROCEDURES. ~~BANDWAGON~~

SAID DISCOVERY IS NEEDED FOR THE PURPOSE OF DETERMINING CREDIBILITY.

SEE DEFENDANTS RESPONSE TO PLAINTIFFS MOTION FOR DISCOVERY # IV PARAGRAPH NUMBER 11.

PROVIDE WORK SCHEDULES FOR DR. SYLVIA FOSTER; DR. CHARLOTTE SELIG, NA MICHAEL ERICKSEN, RM KEN CREASEY, NURSE - HELEN HANLON, DIANE STACHOWSKI, FLORENCE S. - COBB, DAVE SAXTON, CLARENCE OATES, CURTIS - CORNISH, WILLIAM EVANS, DR KATHERINE SHENEMAN, AND NANCY ANDERSON.

- 2.) A, PHOTO COPY OF THE INSURANCE POLICY THAT THE D.P.C UTILIZES AND OR WAS BEING UTILIZED FOR THE DEFENDANTS MOFFETT - GRAY - SAGERS AND JOHNSON, FOR THE PURPOSE OF DETERMINING LIABILITY; ETC. DATING FROM 5/21/04 TO 6/25/04.
- 3.) A PHOTO COPY OF THE DEFENDANTS MOFFETT - SAGERS - GRAY - AND JOHNSON'S D.P.C JOB CONTRACT OF EMPLOYMENT. FOR THE PURPOSE OF FACTUALLY DETERMINING THEIR JOB DESCRIPTIONS DATING FROM 5/21/04 TO 6/25/04 DURING THE COURSE OF THE PLAINTIFFS STAY AT THE D.P.C.
(NOTE : AND OR EMPLOYEE APPLICATION.)
- 4.) THE FACT FINDING DOCUMENT UTILIZED IN FORMING THE UNSUBSTANTIATED DECISION REGARDING THE PLAINTIFF'S JUNE 20, 04 D.P.C GRIEVANCE REGARDING GRAY - MOFFETT AND SAGERS

MITCHELL BUILDINGS
5.) CLOSE OBSERVATION LOG SHEET(S)
FOR 6/14/04, NEEDED TO CONFIRM
OR DENY IF LANCE SAGERS WAS
ASSIGNED TO ONE AND OR TWO PERSON
CLOSE OBSERVATION OF ANY SPECIFIC
PATIENT AT OR ABOUT 8:00 PM

6.) A PHOTO COPY OF DUTY ASSIGNMENT
FOR ~~WINTERHURST HOSPITAL~~ SAGERS
FOR 6/14/04 AT THE D.P.C

CERTIFICATE OF SERVICE

I, ~~THE UNDERSIGNED PLAINTIFF~~ JIMMIE LEWIS
DOE HEREBY CERTIFY ON THIS 28TH, DAY OF FEB,
2007, THAT I DID MAIL ONE TRUE AND CORRECT
COPY OF THE MOTION FOR LEAVE TO PROPOUND
DISCOVERY FROM AND FOR DEFENDANTS MOFFETT-
GRAY-SAGERS AND JOHNSON PURSUANT TO FED R-
CIV P# 34, BY U.S. POSTAL TO THE FOLLOWING:

CLERK OF THE COURT (GMS)
UNITED STATES DISTRICT COURT
844 N. KING ST, LOCKBOX 18
WILMINGTON, DELAWARE 19801

GREGORY E. SMITH
DEPUTY ATTORNEY GENERAL
820 N. FRENCH ST, 7TH FL
WILMINGTON, DELAWARE 19801

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